

ORIGINAL

2017 OCT 13 PM 12:11
CLERK OF COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS - FORT WORTH**

WADE ALLEN DELK,
Plaintiff,

V.

KENNETH DEAN MARTIN
Defendant.

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Case No: 4:17-cv-00605-A

DEFENDANT KENNETH DEAN MARTIN'S
ORIGINAL ANSWER TO PLAINTIFF'S COMPLAINT

NOW COMES KENNETH DEAN MARTIN, named defendant in the above-styled cause, and in accordance with the Court's Order issued September 20, 2017 (Doc. 23), files this his original Answer to *Plaintiff's Complaint* ("Complaint", Doc. 24) filed by the plaintiff, Wade Allen Delk, in which the defendant responds to each paragraph of the Complaint with the corresponding numbered statement below.

I. ANSWER (Specific Answer to Allegations)

1. The defendant is not knowledgeable about the plaintiff's organization and business or where it may legally transact business, but does not otherwise deny.
2. The defendant is not knowledgeable about the location of plaintiff's residence, but does not otherwise deny..
3. Admit.
4. Admit.

5. Admit.

6. Admit.

7. The defendant claims his right to remain silent to this facts alleged in this paragraph based on the Fifth Amendment of the United States Constitution.

8. The defendant claims his right to remain silent to this facts alleged in this paragraph based on the Fifth Amendment of the United States Constitution.

9. The allegation is a statement of law to which no response is necessary.

10. The allegation comprises case law quotes to which no response is necessary.

11. The defendant claims his right to remain silent to this facts alleged in this paragraph based on the Fifth Amendment of the United States Constitution.

12. The defendant is not knowledgeable regarding the plaintiff's reasoning or claims, and therefore must deny the allegation pending further review.

13. Admit.

14. The defendant is not knowledgeable regarding the plaintiff's need to retain counsel, pay fees, or pay costs of the Court, and therefore must deny the allegation.

II. ANSWER to REQUESTED RELIEF (General)

15. The defendant denies that he has forfeited any interest in the referenced insurance policy, but irrespective of his answers to the allegations, does not oppose the placement of the policy's proceeds to be placed into the Court's registry.

16. The defendant seeks such other and further relief, both general and special, at

law or in equity, to which he may show himself justly entitled.

Respectfully submitted this October 13, 2017,

By:  _____

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Attorney for Defendant Kenneth Martin

CERTIFICATE OF SERVICE - I certify that on October 13, 2017, I mailed the original of this Defendant's Original Answer by U.S.P.S., and served same by facsimile transmission and email to Victor Rivera (469-400-0000 O; 469-317-3331 F; victor@riverafirm.com), counsel for Wade Allen Delk.

By:  _____
Orsen E. Paxton, III